

Salicylic Acid
PC Code: 076602

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DP Number: 395484
EPA File Symbol No.: 34704-RNLT

Type of Review: Product Chemistry, Toxicology, Nontargets, Mode of Action



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

DATE: November 9, 2011

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

SUBJECT: Science Review in Support of Salicylic Acid Technical, Containing 98.7% Salicylic Acid
As Its Active Ingredient.

Decision Number: 439833
DP Number: 395484
EPA File Symbol Number: 34704-RNLT
Chemical Class: Biochemical
PC Code: 076602
CAS Number: 69-72-7
Active Ingredient Tolerance Exemptions: Nonfood-use
MRID Numbers: N/A

FROM: Angela L. Gonzales, Biologist *Angela L. Gonzales* 11/9/11
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

TO: Chris Pfeifer, Regulatory Action Leader
Biochemical Pesticides Branch
Biopesticides & Pollution Prevention Division (7511P)

ACTION REQUESTED

In response to the Agency's request for additional information discussed in a memorandum from A. L. Gonzales to C. Pfeifer dated June 16, 2011, the applicant has submitted a revised Confidential Statement of Formula (CSF) dated October 20, 2011 and a revised data matrix dated October 20, 2011.

RECOMMENDATIONS AND CONCLUSIONS

1. The product chemistry submission is ACCEPTABLE, pending resolution of the deficiencies discussed below.

- a. A description of the material used to package the product must be provided.
- b. Storage stability and corrosion characteristics studies on the MP are required and must be submitted. According to the registrant, these studies are in progress.

NOTE TO RAL:

1. The registrant states in the cover letter dated September 9, 2010 that the proposed MP will be formulated into EPs to be used on seeds that are not meant for human or animal consumption. However, there is no indication of this on the proposed MP label.

STUDY SUMMARIES

Product Chemistry (no MRID)

All previously identified deficiencies were corrected on the CSF. A description of the material used to package the product was not provided to the reviewer. Storage stability and corrosion characteristics studies are in progress according to the registrant.

cc: Angela L. Gonzales, Chris Pfeifer, BPPD Science Review File, IHAD/ARS
A. L. Gonzales, FT, PY-S: 11/9/11